Preliminary Amendment dated <u>04/19/04</u> Appl. No. 09/272,069 Atty. Docket No. 0100.9900340

REMARKS

This is in response to an Advisory Action dated April 2, 2004. Applicants respectfully traverse and request reconsideration.

Amended Claims 20-22 and added claims 23-32

Applicant respectfully submits, for the Examiner's consideration, amended claims 20-22. Claims 20-22 have been amended to provide further distinction of the limitation of the frame buffer in conjunction with the claimed gamma correction block. Claims 20-21 have been amended regarding the display information from the frame buffer used by the gamma correction block to generate gamma corrected data. Claim 22 has been amended regarding the pixel information as being generated from the display information stored within the frame, as inherently previously claimed herein when the claims are read in light of the specification, see for example page 10, lines 3-14.

Applicant respectfully submits, for the Examiner's consideration, added claims 23-32. It is submitted that the claims do not add any new matter as these claims provide limitations previously claimed in claims 1-5 (more specifically $23\&28 \rightarrow 1$, $24\&29 \rightarrow 2$, $25\&30 \rightarrow 31$, $26\&32 \rightarrow 32$), directed to limitations previously claimed in claims 20 and 21.

Therefore, it is submitted that these claim amendments and additions are directed to form and not to substance and are proper in the present After Final response, wherein the Examiner is not required to conduct any further prior art searching. Entrance of these amendments is respectfully requested.

Rejection under 35 U.S.C. §102(e)

Claims 1-6, 8-9 and 20-22 previously stood rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,388,648 ("Clifton").

Regarding claims 6-7 and 8-9, Applicant respectfully submits the rejection is moot in view of the cancellation of these claims, without prejudice.

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Regarding claims 1-5, these claims will be addressed with respected to current claims 23-32.

Regarding claims 20-22, it is submitted that Clifton fails to disclose all of the claimed limitations claimed herein. Clifton is directed to, *inter alia*, a color gamma luminance matching technique for use with an image display system. More specifically, Clifton discloses, *inter alia*, utilizing a plurality of LCD projection units having luminance and color balance systems employing an LCD array characterization look up table storing multiple sets of luminance and gamma correction values selectable to control luminance and color balance. Color gamma correction systems are combined with luminance and color balancing systems to match primary colors in addition to white and luminance values. The combined systems provide suitable color matching for an image, solving problems associated with a multi-screen display system. Using a color mixing method, primary colors are adjusted and a primary color matching algorithm involves measuring intrinsic color coordinates of primary colors, for determining a set of predetermined target coordinates and performing matrix operations to calculate the set of coefficients used in a color space conversion circuit to convert measured to target coordinates, thereby matching primary colors.

Claims 20 – 21 recite, *inter alia*, "a frame buffer, wherein the frame buffer stores display information;" and "the gamma correction block receives the display information from the frame buffer." In support of the present rejection, the Examiner asserts that "Clifton discloses a frame buffer storing display information (Fig. 2)" (Page 5, first sentence of final paragraph). FIG. 2 of Clifton illustrates a video signal source 14, multiscreen display driver 16, multiple display controllers 18A-18N and multiple displays 12 within a multiscreen display. Furthermore, the complete discussion of FIG. 2 of Clifton consists of 17 lines of text, as duplicated below:

FIG. 2 shows an exemplary multiscreen display system 10 employing a three-by-three array of LCD projection units 12A, 12B, . . . to 12N (collectively LCD projection units 12). Of course, N may be as small as two and as big as practical to form a very large array of LCD projection units. Of course, this invention may also be employed in stand-alone LCD units. A conventional video signal source 14 drives a conventional multiscreen display driver 16, such as the PICBLOC 3 unit described in the background section of this application. Each of LCD projection units 12 are interconnected with multiscreen display driver 16 by

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associated display controllers 18A, 18B, . . . , to 18N, which perform LCD projection unit luminance and color balance functions as described below with reference to FIGS. 4-10. Display controllers 18 are preferably integrated within projection units 12. Multiscreen display system 10 seamlessly displays a total image having a substantially uniform luminance and color balance.

It is submitted that FIG. 2 does not illustrate a frame buffer storing display information and the accompanying text of Clifton does not disclose a frame buffer storing display information. FIG. 2 and the accompanying text of Clifton disclose a video signal source providing an incoming video signal to a driver 16 that divides the signal into appropriate subsignals for the various display controllers 18. Clifton discloses a completely different system, sub-dividing a display for multiple LCDs and generates a completely different result that does not disclose including a frame buffer to store the display information prior to performing gamma correction thereon. It should also be noted that none of the further figures and specification of Clifton disclose the claimed frame buffer of claims 20-21. Therefore it is submitted the rejection is improper as Clifton fails to disclose all of the claimed limitations.

Regarding claim 22, Applicant resubmit the above position regarding claims 20 and 21 as claim 22 claims pixel information generated from display information stored within a frame buffer. As noted above, Clifton does not disclose a frame buffer and therefore does not disclose the pixel information generated from display information stored within the frame buffer. Therefore, for the same position as noted above with regards to claims 20 and 21, it is submitted the present rejection is improper and should be withdrawn.

Regarding claims 23-32, it is submitted that these claims contain further patentable subject matter in view of Clifton. Applicant respectfully resubmits the above-offered position regarding claims 20 and 21 and submit that claims 23-27 add further claimed limitations not disclosed by Clifton and the claims 28-32 add further claimed limitations not disclosed by Clifton. For example, claims 23 and 28 recite limitations to the claimed gamma correction block, wherein the gamma correction block receives display information from the frame buffer. As noted above, Clifton does not disclose, *inter alia*, a frame buffer and therefore does not disclose all of the claimed limitations. As such, reconsideration and withdrawal of the present rejection is respectfully requested.

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Should the Examiner maintain the present rejection regarding claims 20-22 and subsequently against 23-32, Applicants request a showing, including column and line numbers of where explicitly Clifton discloses a frame buffer consistent with the claimed present invention. In the alternative, passage of the pending claims to issuance is requested.

Accordingly, Applicant respectfully submits that the claims are in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Date: 4/19/04

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